

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

BUILDERS MUTUAL INSURANCE COMPANY,

Plaintiff,

v.

Civil Action No. 2:09cv185

DRAGAS MANAGEMENT CORPORATION
and FIREMEN'S INSURANCE COMPANY
OF WASHINGTON, D.C.,

Defendants.

**MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADINGS TO THE CROSSCLAIM**

Defendant, Dragas Management Corporation ("Dragas Management"), moves this Court to extend the time through June 22, 2009 for Dragas Management to answer, plead, or otherwise respond to the Crossclaim filed by the defendant, Firemen's Insurance Company of Washington, D.C. ("Firemen's"), and in support thereof, states as follows:

1. Firemen's served its Crossclaim upon Dragas Management on May 21, 2009. The time for Dragas Management to answer, plead, or otherwise respond has not passed, and more time is needed to form such responses in this matter.

2. Under Local Civil Rule 7(F)(2) of the Local Rules of Practice for this Court, no separate brief in support of this motion is required.

3. Dragas Management has requested from counsel for Firemen's and Plaintiff an extension of time in which to answer, plead, or otherwise respond to the Crossclaim through June 22, 2009. Counsel for Firemen's and Plaintiff have agreed.

4. Attached as **Exhibit A** is a proposed Order granting Dragas Management the relief sought. Counsel for Dragas Management, Firemen's and Plaintiff have agreed to the proposed order, and the proposed Order is being circulated and will be submitted to the Court once it is fully endorsed.

WHEREFORE, Defendant, Dragas Management Corporation, by counsel, requests that this Court enter an Order granting Dragas Management Corporation an extension of time to answer, plead, or otherwise respond to the Crossclaim through and including June 22, 2009.

Dated: June 10, 2009

Respectfully submitted,

/s/ Kristan B. Burch

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Counsel for Defendant Dragas Management Corporation

CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
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Civil Action No. 2:09cv185

DRAGAS MANAGEMENT CORPORATION
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Defendants.

AGREED ORDER

On this day came the parties, by counsel, upon the Motion for an Extension of Time to File Responsive Pleadings to the Crossclaim (“Motion for Extension of Time”) filed by the Defendant, Dragas Management Corporation (“Dragas Management”), and, upon consideration of the arguments set forth in the Motion for Extension of Time and for good cause shown, it is

ORDERED that the Motion for Extension of Time filed by Dragas Management is granted and Dragas Management shall have through and including June 22, 2009 in which to answer, plead or otherwise respond to the Crossclaim filed by Defendant, Firemen’s Insurance Company of Washington, D.C.

Enter: ____/____/____

Judge: _____
United States District Court
Eastern District of Virginia

I ASK FOR THIS:

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